

ORIGINAL
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Aug 8 '01

RICH

U.S. DIST.
NO. DIST.UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISIONCR 01 20127 JF
No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROGER VER,

Defendant.

VIOLATIONS: 18 U.S.C. 842(a)(1) -
Dealing in Explosives without a License; 18
U.S.C. § 842(j) - Illegally Storing
Explosives; 18 U.S.C. § 1716 - Mailing
Injurious Articles

SAN JOSE VENUE

INFORMATION

The United States Attorney charges:

Count One: (18 U.S.C. § 842(a)(1) - Dealing in Explosives without a License)On or about and between December 1, 1998, and December 14, 2000, both dates being
approximate and inclusive, in Santa Clara County in the Northern District of California, the
defendant

ROGER VER

did engage in the business of dealing in explosive materials without a license in violation of Title
18, United States Code, Section 842(a)(1).

INDICTMENT

1 Count Two: (18 U.S.C. § 842(j) and 27 C.F.R. §§ 55.201(f), 55.208(b) – Storing Explosives in
2 a Manner Not in Conformity with Treasury Regulations)

3 On or about and between December 1, 1998, and December 14, 2000, both dates being
4 approximate and inclusive, in Santa Clara County in the Northern District of California, the
5 defendant

6 ROGER VER

7 did store explosive material in a manner not in conformity with regulations promulgated by the
8 Secretary of the Treasury, namely he stored explosive material in a residence and dwelling, and did
9 store such materials without notifying the authority having jurisdiction for fire safety in Santa Clara
10 County of the type, magazine capacity, and location of each site where such explosive materials were
11 stored, all in violation of Title 18, United States Code, Section 842(j), Title 27, Code of Federal
12 Regulations, Sections 55.201(f) and 55.208(b).

13 Count Three: (18 U.S.C. § 1716 – Mailing Injurious Articles)


14 On or about April 2, 1999, in Santa Clara County, in the Northern District of California, the
15 defendant


16 ROGER VER

17 did knowingly deposit for mailing and delivery, and knowingly caused to be delivered by mail,
18 according to the direction thereon, items declared nonmailable in Title 18, United States Code,
19 Section 1716, namely explosives, inflammable materials, infernal machines, and mechanical,
20 chemical, and other devices or compositions which may ignite or explode, and not in accordance
21 with the rules and regulations authorized by the Postal Service, as follows, in violation of Title 18,
22 United States Code, Section 1716.

23 DATED: Aug. 8, 2001

24 ROBERT S. MUELLER, III
United States Attorney

25 
26 ELIZABETH DE LA VEGA
27 Chief, San Jose Branch Office

28 (Approved as to form: )

AUSA FREWING

INDICTMENT